REMARKS/ARGUMENTS

The Examiner requested that applicant provide serial numbers in the "Cross Reference to Other Applications" section on pg. 16 of the Application. (Office Action, pg. 2) Applicants note that there is no such section in the Application or any cited patent applications. Further, page 16 includes claims, not cross references. Accordingly, there are no patent serial numbers to add.

The Examiner objected to the Title as not indicative of the invention. (Office Action, pg. 2) Applicants traverse and submit that the title is indicative of the invention and includes language from the claim preamble. Applicants request that if the Examiner continues to object to the Title, that the Examiner suggests language to add to the Title.

The Examiner found that claims 3-10, 13-16, 20-27, 30-33, 37-44, and 47-50 would be allowed if written in independent form including the requirements of the base and intervening claims. Applicants have rewritten allowable claims 4, 14, 21, 31, 38, and 48 in independent form including the requirements of the base claims. Allowable claims 5-10, 22-27, and 39-44 are now in condition for allowance because they depend from one of amended independent claims 4, 21, and 38. The other allowable claims are patentable over the cited art because they depend from one of claims 1, 18, and 35, which are patentable over the cited art for the reasons discussed above.

In incorporating the requirements of the base claims 1, 18, and 35 into dependent claims 4, 21, and 38, Applicants replaced the generating graphical representation limitation of base claims 1, 18, and 35 with the graphical representation limitations of the dependent claims.

The Examiner rejected claims 1, 2, 11, 12, 17-19, 28, 29, 34-36, 45, 56, and 51 as obvious (35 U.S.C. §103) over Upson (U.S. Patent No. 5,652,867) and Jeyachandran (U.S. Patent No. 6,141,662). Applicants traverse for the following reasons.

Claims 1, 18, and 35 concern transforming files from a source file format to a destination file format, and require: generating a data structure in a computer readable medium indicating available transforms from a plurality of source file formats to at least one destination file format; generating a graphical representation of available transforms from the source file formats to the at least one destination file format based on the available transforms indicated in the data structure; receiving user input indicating a selected source file having a source file format and a selected destination file having a selected destination file format, wherein the data structure

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indicates one available transform to transform the selected source file format to the selected destination file format; and transforming the selected source file in the source file format to the selected destination file in the destination file format.

The Examiner cited col. 7, lines 10-20 and col. 10, lines 23-35 of Upson as teaching the claim requirements of generating a graphical representation of available transforms from the source file formats to the at least one destination file format based on the available transforms indicated in the data structure. (Office Action, pg. 4) Applicants traverse.

The cited col. 7 discusses a conversion system to transform data, such that input templates describe the input data structure whereas output templates describe the structure of the desired output data, and assignments are a user desired computation to construct the output template from the content of the input template. The cited col. 10 discusses a data scribe module 94 that executes a data transform program and converts an input data structure into desired output. The data scribe is given a data transform program by the user.

Although the cited cols. 7 and 10 discuss transforming input data to output data, nowhere do the cited cols. 7 and 10 anywhere teach or suggest the claim requirement of generating a graphical representation of available transforms from the source file formats to the at least one destination file format based on the available transforms indicated in the data structure. There is no suggestion or mention in the cited cols. 7 and 10 of generating a graphical representation of available transforms as claimed.

The Examiner cited col. 4, lines 44-65, col. 7, lines 10-20 and col. 10, lines 23-35 as teaching the claim requirement of receiving user input indicating a selected source file having a source file format and a selected destination file having a selected destination file format, wherein the data structure indicates one available transform to transform the selected source file format to the selected destination file format. (Office Action, pg. 4).

The cited col. 4 mentions that the user constructs a visual graphical output template describing the output data and how the output data structure is to be constructed from the input data. A scribe module is generated to carry out the data conversion. Nowhere does this cited col. 4 anywhere teach or suggest the claim requirement of receiving user input indicating a selected source file having a source file format and a selected destination file having a selected destination file format, and that a data structure indicates one available transform to transform

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the selected source file format to the selected destination file format. Although the cited col. 4 discusses how the user may specify to perform a transform and that a data scribe module may perform a transformation, nowhere does the cited col. 4 anywhere disclose receiving user selection of a source file and destination file and that a data structure indicates an available transform to transform from the user selected source file to destination file.

The cited col. 7 discusses a conversion system to transform data, such that input templates describe the input data structure whereas output templates describe the structure of the desired output data, and assignments are a user desired computation to construct the output template from the content of the input template. The cited col. 10 discusses a data scribe module 94 that executes a data transform program and converts an input data structure into desired output. The data scribe must be given a data transform program by the user.

Although the above cited Upson discusses transforming input data template to an output data template, nowhere in the cited Upson is there any teaching or suggestion of receiving user selection of a source file and destination file, where a data structure indicates an available transform to transform from the user selected source file to destination file.

Accordingly, claims 1, 18, and 35 are patentable over the cited combination because the cited combination of patents does not disclose all the claim requirements.

Claims 2, 11, 12, 17, 19, 28, 29, 34,36, 45, 56, and 51 are patentable over the cited art because they depend from one of claims 1, 18, and 35 which are patentable over the cited art for the reasons discussed above.

Claims 11, 28, and 45 depend from claims 1, 18, and 35 and further require generating a graphical representation of a transformation operation to be displayed between a graphical representation of the selected source file format and a graphical representation of the selected destination file format. The Examiner cited col. 7, lines 10-20 and col. 10, lines 23-35 of Upson as teaching these claim requirements. (Office Action, pg. 5) Applicants traverse.

The cited col. 7 discusses a conversion system to transform data, such that input templates describe the input data structure whereas output templates describe the structure of the desired output data, and assignments are a user desired computation to construct the output template from the content of the input template. The cited col. 10 discusses a data scribe module

94 that executes a data transform program and converts an input data structure into desired output. The data scribe must be given a data transform program by the user.

Although the cited cols. 7 and 10 discuss transforming an input template to an output template, nowhere do the cited cols. 7 and 10 anywhere teach or suggest generating a graphical representation of a transformation operation displayed between graphical representations of the selected source file and destination file formats. There is no mention of generating the claimed graphical representation of a transformation to be performed in the cited Upson's discussion of transforming data.

Accordingly, claims 11, 28, and 45 provide additional grounds of patentability over the cited art because the additional requirements of these claims are not suggested in the cited art.

The cited cols. 12, 29, and 46 depend from claims 11, 28, and 45, respectively, and further require that the generated graphical representation of the transformation operation comprises an arrow displayed from the graphical representation of the selected source file format to the graphical representation of the selected destination file format.

The Examiner cited the same above discussed col. 7, lines 10-20 and col. 10, lines 23-35 of Upson as teaching these claim requirements. (Office Action, pg. 6) Applicants traverse.

As discussed, the cited cols. 7 and 10 discuss transforming an input template to an output template. Nowhere does this cited Upson anywhere disclose the requirements concerning generating a graphical representation of a transform operation. Further, because there is no suggestion of generating a graphical representation of a transform operation there is also no suggestion that the generated graphical representation of the transformation comprises an error displayed from the selected source file format to the selected destination file format.

Accordingly, claims 12, 29, and 46 provide additional grounds of patentability over the cited art because the additional requirements of these claims are not suggested in the cited art.

Conclusion

For all the above reasons, Applicant submits that the pending claims 1-51 are patentable over the art of record. Applicants submit herewith the fees for the claim amendments. Nonetheless, should any additional fees be required, please charge Deposit Account No. 09-0460.

Amdt. dated June 14, 2004   Serial No. 09/934,721
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                                                                         Firm No. 0054.0019

The attorney of record invites the Examiner to contact him at (310) 553-7977 if the

Examiner believes such contact would advance the prosecution of the case.

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